

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

**THE DIRECT RESPONSE RESOURCE, INC.,)
An Illinois corporation,)**

Plaintiff,)

v.)

Case No.: 07-CV-6301

**HIRSH PRESENTATION SYSTEMS)
USA, INC., a New Jersey corporation,)**

Judge: Guzman

Defendant.)

**HIRSH PRESENTATION SYSTEMS)
USA, INC., a New Jersey corporation,)**

Defendant/Third-Party Plaintiff,)

v.)

**HIRSH BRACELET (HK) LTD., a Hong Kong)
Private Limited Company, and)
SCHENKER, INC., a New York corporation,)**

Third-Party Defendants.)

**SCHENKER, INC.'S MOTION FOR EXTENSION OF
TIME TO ANSWER OR OTHERWISE PLEAD**

Third-Party Defendant, SCHENKER, INC. ("Schenker"), by and through its attorneys, Dennis Minichello and Stephanie Espinoza of Marwedel, Minichello & Reeb, P.C., and for its Motion for Extension of Time to Answer or Otherwise Plead, states as follows:

1. Plaintiff filed its lawsuit on November 6, 2007.
2. Defendant/Third-Party Plaintiff Hirsch Presentation Systems USA, Inc. filed a Third-Party Complaint against Schenker and Hirsch Bracelet (HK) Ltd. on December 27, 2007.

3. Schenker was served with defendant Hirsch Presentation Systems USA, Inc.'s Third-Party Complaint on December 28, 2007. It does not appear that Hirsch Bracelet (HK) Ltd. has been served.

4. This matter arises out of the shipment of cargo from Hong Kong to Chicago, Illinois, by air and truck. Numerous entities were involved in the shipment, and various legal issues may be implicated by the international nature of the shipment. The undersigned counsel has been diligently seeking the necessary information to prepare its responsive pleading. Additional time is requested to continue to gather and process the required information.

5. Hirsch Bracelet (HK) Ltd., the other Third-Party Defendant, has not yet been served, and, therefore, the parties will not suffer any prejudice by allowing Schenker additional time to answer or otherwise plead. The Court has not set any discovery or trial schedule in this matter. The initial status hearing has been continued to February 13, 2008.

6. Counsel for Defendant/Third-Party Plaintiff Hirsch Presentation Systems USA, Inc. has been advised of this motion and has no opposition to Schenker's request for an additional period of time to answer or otherwise plead.

WHEREFORE, Third-Party Defendant SCHENKER, INC. respectfully requests that this Honorable Court grant it an additional 30 days to answer or otherwise plead to the Third-Party Complaint.

Respectfully submitted,

By: /s/ Stephanie Espinoza
Attorney for Defendant,
SCHENKER, INC.

Dennis Minichello
Stephanie Espinoza

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CERTIFICATE OF SERVICE

I, Stephanie Espinoza, an attorney, certify that on this 17th day of January, 2008, I electronically filed Schenker, Inc.'s Motion for Extension of Time to Answer or Otherwise Plead with the Clerk of the Northern District of Illinois via its CM/ECF system, which will send a notice of electronic filing to the following counsel:

/s/ Stephanie A. Espinoza
Stephanie A. Espinoza

